Webster

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

APR 11 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

4WD-RPB

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

Subject: Review of Summary of Investigative Work
Notice of Technical Inadequacy
Imposition of Interim Measures
Randall Textron Facility,
Grenada, Mississippi
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

As you are aware, the HSWA Permit for your facility was issued July 7, 1998, to address the environmental investigation, reporting requirements, and/or confirmatory sampling for 8 solid waste management units (SWMUs) and 3 areas of concern (AOCs). The U.S. Environmental Protection Agency (EPA) issued a combined RFI/Confirmatory Sampling (CS) Work Plan call letter on March 2, 1999. The RFI/CS Work Plan was called to require information and investigation at specific SWMUs and AOCs.

On July 25, 1999, the facility submitted a Summary of Investigative Work (SOIW) conducted at the facility. As a result of discussions between EPA and the facility, it was decided that the SOIW could be submitted to document the investigative and remedial work that had already been conducted under the facility's RCRA Base Permit. The EPA recently completed its review of the SOIW. EPA is prepared to accept this document in lieu of a draft RFI Report. EPA's comments on the SOIW are enclosed. After addressing EPA's comments, the revised version of this document should be titled RFI Report.

The SOIW documents that there is groundwater and soil contamination at several SWMUs and that the groundwater contamination is facility-wide due to comingling of plumes from regulated units and SWMUs. EPA would like to propose that the facility address the groundwater contamination on a 'whole facility basis' in the future, rather than on a SWMU by SWMU basis. Source removal and soil contamination must still be addressed on a SWMU by SWMU basis for all SWMUs and AOCs listed on Table G.1 and G.3 in the facility's permit.

Docket Number 450917

EPA would like the facility to begin corrective action as soon as possible at the highest priority SWMUs and AOCs requiring further action as listed in the facility's HSWA permit and/or shown by the SOIW to require further action. To this end, EPA is requiring that an Interim Measures (IM)Workplan for SWMUs 12, 14, 15 and AOCs A and B be generated within 30 days of receipt of this letter. The IM Workplan should address source removal including closure of the Chromium Destruct Pit and facility-wide groundwater contamination as it relates to the SWMUs under interim measures for all remaining SWMUs requiring further corrective action. The proposed Interim Measures should augment or support the facility's contemplated final remedy. Please note that until the IM Workplan is submitted on or before the due date, you have not fulfilled the requirements of your HSWA permit. Continued noncompliance may result in a formal enforcement action pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6920, under which EPA may seek the imposition of penalties up to $27,500 for each day of noncompliance.

A meeting is being scheduled in April for EPA's facility manager to tour the facility, discuss comments on the Draft RFI Report, Interim Measures, and future steps with respect to the HSWA corrective action process. Meanwhile, should you have any questions or concerns, please contact Mr. Don Webster at (404) 562-8469.

Sincerely,

Narindar M. Kumar, Chief
RCRA Programs Branch
Waste Management Division

Enclosure
cc: Louis Crawford, MDEQ
John Devic, Textron Automotive
John Bozick, Meritor Automotive

Summary of Investigative Work, (SOIW) Randall Textron Facility, Grenada, Mississippi: EPA Comments

General

1. The SOIW documents that there is groundwater and soil contamination at several SWMUs and that the groundwater contamination is facility-wide. EPA would like to propose that the facility address groundwater contamination on a 'whole facility basis' in the future, rather than on a SWMU by SWMU basis. Source removal and soil contamination must still be addressed on a SWMU by SWMU basis for all SWMUs and AOCs listed on Table G.1 and G.3 in the facility's permit.

2. EPA would like the facility to begin corrective action as soon as possible at the highest priority SWMUs and AOCs requiring further action in the facility's HSWA permit and/or shown by the SOIW to require further action. To this end, EPA is requiring that an Interim Measures (IM)Workplan for SWMUSs 12, 14, 15 and AOCs A and B be generated within 30 days of receipt of this letter. The IM Workplan should address source removal, closure of the Chromium Destruct Pit and facility-wide groundwater contamination.

Specific

1. Concentrations of contaminants in Tables 2-1 through 2-7 and in Section 3.0, Data Summaries for SWMUs and AOCs, should list the appropriate maximum allowable exposure level for each contaminant, such as EPA Region 3 Risk-Based Concentrations (RBCs) for soil and air; Office of Water, Maximum Contaminant Levels (MCLs) for ground and drinking water; and any appropriate surface water quality or sediment screening standards. Detected values should then be compared to the appropriate target cleanup levels in the same measurement units as the standard. For example, MCLs for groundwater are reported in mg/l and risk based concentrations for soil and sediment are reported in mg/kg. The SOIW reports organics in ug/l and metals variously as mg/l or ug/l. Please convert all measurements to a consistent standard format and resubmit revised pages for the final RFI report.

2. In order to make comparisons of corrective action effectiveness at various monitoring well locations, the facility should plot concentration versus time of key VOC and metal contamination constituents at each monitoring well. This will yield a graphic representation and show the effectiveness of remediation. This information should be included in future Groundwater Monitoring Reports.

3. The overlay figure provided should have the locations of all monitoring and recovery wells indicated more clearly. On the overlay provided, it is difficult to see the detail of the entire facility. The LNAPL, DNAPL and Chromium plumes should be marked in color. Please show the direction of surface water flow and groundwater flow on the figure.

SWMU Specific

1. SWMU 7- Outfall Ditch: At this SWMU, the reported levels of Chromium in the surface water exceeded the National Recommended Water Quality Criteria. TCE exceeded the recommended levels for human consumption by an order of magnitude or more. Is a warning against human consumption posted at Riverdale Creek? However, sediment samples did not exceed RBCs for total Chromium and an ecological screening level for TCE in sediment has not been calculated. EPA is concerned about the continued release of TCE and Chromium in the effluent from the waste water treatment facility, and will inquire at the MDEQ Water Branch what effect these exceedences of the National Recommended Water Standards may have on compliance with the facility's NPDES permit. EPA cannot grant no further action status for this SWMU at this time, but does not require this SWMU to be included in Interim Measures.

2. SWMU 12- Wet Well Sump: The reported TCE concentrations exceed both MCLs and Risk Based Cleanup action levels in the groundwater, at monitoring well RT-2, closest to the Wet Well. Because of the lack of soil data at this SWMU, confirmatory soil samples must be taken. Soil samples should be taken at 2 foot intervals from ground surface to below this unit. Based on EPA's technical review of the SOIW, this SWMU cannot be granted No Further Action status. This SWMU must be included in the Interim Measures Workplan for remediation of groundwater contamination and possible source removal, pending the results of soil sampling.

3. SWMU 14- Chromium Destruct Pit: Reported groundwater levels of Chromium and TCE exceed MCLs. The SOWI does not indicate that any soil samples were taken below the unit. Soil samples should be taken at depths greater than ten feet around and below this unit so that a judgement can be made regarding the extent of source removal. This SWMU must be included in the Interim Measures Workplan for remediation of groundwater contamination and removal of contaminated soils.

4. SWMU 14- Chromium Destruct Pit and SWMU 15- Process Sewers: These SWMUs have released listed hazardous wastes (F006) and hazardous constituents (TCE, DCE, Cr, As) to the groundwater and soil. Both the Chromium Destruct Pit, and the Process Sewers have been in use since 1961. Both units have a history of systematic and continuing releases of listed wastes subject to the Land Disposal Restrictions of RCRA and could be

considered to be Regulated Units if so desired by the MDEQ. They must be closed under appropriate closure requirements in Part 264 Subparts J through L. The Interim Measures Plan for these units must include provisions for alternatives to these units, temporary closure of these units, and investigation into the extent of source removal necessary to eleminate releases from these units.

5. SWMU 15- Process Sewers: The SOIW confirms the presence of TCE and Chromium in the groundwater at this SWMU. The Process Sewers provide a pathway for release of groundwater contaminants into the ambient air of the Main Plant Building. Because the process sewers under the Main Plant Building are contaminated from past activities, any cleanup plan should consider the utility of soil vapor extraction of groundwater and soil contaminants or some similar technology for long term cleanup of the air and groundwater. SWMU 15 must be included in the Interim Measures Workplan for remediation of groundwater contamination and possible remediation of air.

6. SWMU 15- Process Sewers: The sewer line that runs from the Destruct Pit to the Wet Well has been closed. EPA recommends that all portions of the process sewers no longer in use be filled with concrete to prevent their inadvertent or accidental use. EPA recommends that all hazardous waste containing materials piped in the plant be piped above ground so that piping can be easily inspected. As part of Interim Measures, the Process Sewers still in operation carrying hazardous waste or hazardous constituents must be integrity tested and repaired as soon as practicable if a release is found. EPA considers the process sewers to be a potential source of continuing releases.

7. EPA requires that as part of the Interim Measures Workplan, indoor air be tested for VOCs, at a minimum; TCE, 1,2-DCE, Benzene, Ethylbenzene, Xylene, and Toluene, in areas of the main plant where the Process Sewers are still operational. If levels of indoor air contaminants are found to be above Risk-based limits, EPA recommends that the facility take appropriate steps to immediately reduce air contamination, comply with OSHA regulations, and to inform employees. Air releases are considered SWMUs by EPA and are subject to HSWA Corrective Action. Indoor air testing must be included in the Interim Measures Workplan.

8. AOC A- Former Trichloroethylene Storage Area: As reported in the SOIW, groundwater and soil contain high levels of PCE, TCE, 1,2-DCE exceeding MCLs. This contamination resulted from the release of 10,000 to 12,000 gallons of TCE in the early 1980's. About 570 gallons of of TCE has been recovered from this release using recovery wells located in the vicinity of the release, however, interim remediation activities at this AOC, and AOC B have been suspended as stated in the SOIW. It is EPA's opinion that corrective action to date has not been effective in recovering most of the DNAPL from the release.

High subsurface concentrations of these contaminants are known to exist downgradient of this AOC (Figure 5-47 in SOWI). Table 2-2 in the SOWI demonstrates that TCE concentrations in monitoring wells did not decrease substantially between 1993 and 1998. An Interim Measures Workplan must must be developed to continue remediation of this release. Ultimately, a facility-wide groundwater corrective action program must be developed and implemented to effectively remediate the releases from this and all AOCs and SWMUs. If source removal of contaminated soils, restarting the recovery wells, drilling of new recovery wells or any measure would be effective in remediation of the TCE release, such an approach must be included in the Interim Measures Workplan. Whatever Interim Measures are selected must compliment the facility's final corrective action plan.

9. AOC B- Former Toluene Underground Storage Area: As reported in the SOIW, Groundwater contains high levels of toluene, TCE, 1,2-DCE, ethylbenzene and xylene exceeding MCLs. Corrective action to date has been effective in recovering a significant amount of LNAPL from the release, however, known pockets of this contamination continue to exist (Figure 5-54 in SOIW). This AOC must be included in the Interim Measures Workplan and the facility-wide groundwater corrective action plan. The necessity of source removal of contaminated soils should be evaluated through confirmatory soil sampling before this AOC can be considered NFA.

10. AOC C, the Fuel Tank Farm Containment Area and SWMU 13, the Wastewater Treatment Plant require no further action at this time. If future evidence of significant spills or systematic or continuing releases becomes available, this status may change.